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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

Case No. 3:23-md-03084-CRB (LJC)

**STIPULATION AND [PROPOSED]
ORDER REGARDING MOTIONS
CONCERNING WITNESS AND EXHIBIT
LISTS**

Judge: Honorable Charles R. Breyer
Date: TBD
Time: TBD
Ctrm.: 6-17th Floor

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

WHEREAS, on December 12, 2025, Uber moved to strike Plaintiff's witness and exhibit lists [ECF 4659];

WHEREAS, on December 12, 2025, Uber moved to quash deposition notices of Gus Fuldner, Katy McDonald, and Sunny Wong [ECF 4653];

WHEREAS, on December 12, 2025, Plaintiff moved to preclude Uber from calling live

1 corporate witnesses at trial unless Uber agrees to produce Plaintiff's requested live corporate
 2 witnesses as well, and, regardless, to preclude live testimony from Todd Gaddis and Chad Dobbs
 3 [ECF 4654, 4656];

4 WHEREAS, the parties met and conferred and agreed that oppositions to the three motions
 5 will be due December 17, 2025.

6 The parties agree and respectfully request the Court order that opposition to the three
 7 motions identified above be filed by December 17, 2025. The parties further agree that no replies
 8 are necessary and that the Court can decide all motions with or without holding any hearing.

9

10 **IT IS SO STIPULATED.**

11

12 Dated: December 12, 2025

Respectfully submitted,

13 By: /s/ Sarah R. London

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14 *Attorneys for Defendants*
15 UBER TECHNOLOGIES, INC.,
16 RASIER, LLC, and RASIER-CA, LLC

17
18 **ATTESTATION**

19 Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose
20 behalf the filing is submitted, concur in the filing.

21 Dated: December 12, 2025

22 /s/ Andrew R. Kaufman
23 Andrew R. Kaufman

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-MD-03084-CRB (LJC)

**[PROPOSED] ORDER SETTING DEADLINE
TO OPPOSE MOTIONS REGARDING
WITNESS AND EXHIBIT LISTS**

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

Having considered the parties' Stipulation, the Court orders as follows:

The parties will file oppositions to the motions filed at ECF 4653, 4654, and 4659 by December 17, 2025.

IT IS SO ORDERED.

Dated: _____

Honorable Charles R. Breyer
United States District Judge